

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTIN LUTHER KING, JR.
COUNTY, et al.

Plaintiffs,

v.

SCOTT TURNER in his official capacity
as Secretary of the U.S. Department of
Housing and Urban Development, et al.

Defendant.

No. 2:25-cv-00814-BJR

PLAINTIFFS' UNOPPOSED
MOTION TO AMEND COMPLAINT

Note For Hearing: July 10, 2025
Without Oral Argument

I. INTRODUCTION

Plaintiffs move to amend the Amended Complaint for Declaratory and Injunctive Relief, Dkt. #71 (FAC), in which 31 cities, counties, and other local governments challenged unlawful grant conditions attached to the Continuum of Care (CoC) grant program administered by the U.S. Department of Housing and Urban Development (HUD) and federal grant programs administered by the U.S. Department of Transportation (DOT) and its operating administrations. The proposed Second Amended Complaint (SAC) adds 29 new counties, cities, and other local governments as plaintiffs. In addition, the SAC seeks to challenge materially similar grant conditions attached to HUD's other grant programs and to grants administered by U.S. Department of Health and Human

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 1
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

1 Services (HHS) and its program offices. Because Defendants do not oppose the amendment,
2 Plaintiffs have acted in good faith and without undue delay, and the amendment would not be
3 futile, this Court should grant Plaintiffs' Motion.

4 II. STATEMENT OF FACTS

5 This action challenges unlawful grant conditions that federal agencies have been attaching
6 to grants they administer pursuant to congressionally authorized grant programs. These conditions
7 seek to force Plaintiffs to implement the Trump administration's policy objectives, including
8 ending diversity, equity, and inclusion (DEI) programs, aggressively enforcing immigration law,
9 and adhering to other executive orders unrelated to the grant programs' purposes.

10
11 Eight cities and counties filed the original complaint in this case on May 2, 2025, seeking
12 declaratory and injunctive relief based on the imposition of unlawful conditions by Defendants
13 HUD, Scott Turner, in his official capacity as Secretary of HUD, DOT, Sean Duffy, in his official
14 capacity as Secretary of DOT, the Federal Transit Administration (FTA), and Matthew Welbes, in
15 his official capacity as the Administrator of FTA, on HUD Continuum of Care (CoC) and FTA
16 grant funding. Dkt. #1. This Court issued a temporary restraining order (TRO), ruling that the
17 moving plaintiffs were likely to succeed on the merits of their claims and that they faced imminent
18 and irreparable harm absent TRO relief. Dkt. #52 at 3.

19
20 Shortly thereafter, 23 additional cities, counties, and local housing and transportation
21 agencies joined the original plaintiffs in filing the FAC. In addition to joining new plaintiffs, the
22 FAC challenged materially similar unlawful conditions that had been attached to additional grants
23 administered by DOT and its other operating administrations, including Defendants the Federal
24 Highway Administration (FHWA), the Federal Aviation Administration (FAA), and the Federal
25 Railroad Administration (FRA). Dkt. #71. At the same time, Plaintiffs filed a combined motion
26
27 PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 2
No. 2:25-cv-00814-BJR

1 for a TRO and preliminary injunction (PI). Dkt. #72. After granting the second TRO and extending
 2 the first TRO by a week, this Court granted a PI in favor of all 31 plaintiffs enjoining imposition
 3 or enforcement of the new grant conditions on CoC grants and any DOT grants. Dkt. #169.

4 The proposed SAC seeks to add 29 new counties, cities, and other local governments as
 5 plaintiffs to this lawsuit. Ex. A. It also adds two new defendants—HHS and Robert F. Kennedy,
 6 Jr. in his official capacity as Secretary of HHS. *Id.* ¶¶ 264–65. It challenges materially similar grant
 7 conditions attached to HUD’s other grant programs and to grants administered by HHS. *See id.* ¶¶
 8 514–32, 602–14.

9 Defendants’ counsel confirmed that Defendants do not oppose this Motion.

10 III. ARGUMENT AND AUTHORITY

11 Leave to amend should be freely granted in the interest of justice. Fed. R. Civ. P. 15(a)(2);
 12 *Owens v. Kaiser Found. Health Plan, Inc.*, 244 F.3d 708, 712 (9th Cir. 2001). Courts apply this
 13 rule with “extreme liberality.” *Owens*, 244 F.3d at 712 (quoting *Morongo Band of Mission Indians*
 14 *v. Rose*, 893 F.2d 1074, 1079 (9th Cir.1990)). In deciding whether leave is appropriate, courts
 15 consider any of four factors: “bad faith, undue delay, prejudice to the opposing party, and/or
 16 futility.” *Id.* The party opposing amendment has the burden of showing that, based on these factors,
 17 amendment is not warranted. *See Larrison v. Ocean Beauty Seafoods, LLC*, No. C20-0906-RSM,
 18 2021 WL 2646450, at *1 (W.D. Wash. June 28, 2021) (citing *DCD Programs, Ltd. v. Leighton*,
 19 833 F.2d 183, 187 (9th Cir. 1987)). Thus, when unopposed, a court “cannot find that [a motion for
 20 leave to amend] was in bad faith, would create undue delay, would prejudice [the opposing party],
 21 or that amendment would be futile.” *Id.*

22 Here, Defendants do not oppose amendment and thus, this Court should grant leave to
 23 amend. *See Larrison*, 2021 WL 2646450, at *1. Further, Plaintiffs have acted in good faith and
 24
 25
 26
 27
 PLAINTIFFS’ UNOPPOSED MOTION TO
 AMEND COMPLAINT - 3
 No. 2:25-cv-00814-BJR

without undue delay in responding to federal agencies' imposition of unlawful grant conditions to more and more grant programs, often with extremely short deadlines. And Plaintiffs' claims in the SAC challenging new grant conditions are indistinguishable on the facts and law as the existing claims. *See* Dkt. #169 at 30–38. Accordingly, this Court should grant Plaintiffs leave to amend their FAC.

IV. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court grant them leave to file the Second Amended Complaint.

DATED this 10th day of July, 2025.

PACIFICA LAW GROUP LLP

/s/ Paul J. Lawrence

Paul J. Lawrence, WSBA #13557

Jamie Lisagor, WSBA #39946

Sarah S. Washburn, WSBA #44418

Meha Goyal, WSBA #56058

Galen Knowles, WSBA #59644

Luther Reed-Caulkins, WSBA #62513

Special Deputy Prosecutors

PACIFICA LAW GROUP LLP

401 Union Street, Suite 1600

Seattle, WA 98101

Tel: (206) 245-1700

Fax: (206) 245-1750

Paul.Lawrence@PacificaLawGroup.com

Jamie.Lisagor@PacificaLawGroup.com

Sarah.Washburn@PacificaLawGroup.com

Meha.Goyal@PacificaLawGroup.com

Galen.Knowles@PacificaLawGroup.com

Luther.Reed-Caulkins@PacificaLawGroup.com

Attorneys for All Plaintiffs

1 LEESA MANION
2 King County Prosecuting Attorney

3 /s/ David J. Hackett

4 David J. Hackett, WSBA #21234
5 *General Counsel to Executive*
6 Alison Holcomb, WSBA #23303
7 *Deputy General Counsel to Executive*
8 Erin Overbey, WSBA #21907
9 *Senior Deputy Prosecuting Attorney*
10 Cristy Craig, WSBA #27451
11 *Senior Deputy Prosecuting Attorney*
12 Donna Bond, WSBA #36177
13 *Senior Deputy Prosecuting Attorney*

14 Chinook Building
15 401 5th Avenue, Suite 800
16 Seattle, WA 98104
17 (206) 477-9483
18 david.hackett@kingcounty.gov
19 aholcomb@kingcounty.gov
20 eroverbey@kingcounty.gov
21 cristy.craig@kingcounty.gov
22 donna.bond@kingcounty.gov

23 *Attorneys for Plaintiffs Martin Luther*
24 *King, Jr. County*

25 JASON J. CUMMINGS
26 Snohomish County Prosecuting Attorney

27 /s/ Bridget E. Casey

Bridget E. Casey, WSBA #30459
Rebecca J. Guadamud, WSBA #39718
Rebecca E. Wendling, WSBA #35887

Snohomish County Prosecuting Attorney's Office
3000 Rockefeller Avenue, M/S 504
Everett, WA 98201-4046
(425) 388-6392
Bridget.Casey@co.snohomish.wa.us
Rebecca.Guadamud@co.snohomish.wa.us
Rebecca.Wendling@co.snohomish.wa.us

Attorneys for Plaintiff Snohomish County

1
2 DAVID CHIU
San Francisco City Attorney

3 /s/ David Chiu

4 David Chiu (CA Bar No. 189542)

5 *San Francisco City Attorney*

6 Yvonne R. Meré (CA Bar No. 175394)

7 *Chief Deputy City Attorney*

8 Mollie M. Lee (CA Bar No. 251404)

9 *Chief of Strategic Advocacy*

10 Sara J. Eisenberg (CA Bar No. 269303)

11 *Chief of Complex & Affirmative Litigation*

12 Ronald H. Lee (CA Bar No. 238720)

13 *Assistant Chief, Complex & Affirmative Litigation*

14 Alexander J. Holtzman (CA Bar No. 311813)

15 *Deputy City Attorney*

16 1390 Market Street, 7th Floor

17 San Francisco, CA 94102

18 (415) 554-4700

19 Cityattorney@sfcityatty.org

20 Yvonne.Mere@sfcityatty.org

21 Mollie.Lee@sfcityatty.org

22 Sara.Eisenberg@sfcityatty.org

23 Ronald.Lee@sfcityatty.org

24 Alexander.Holtzman@sfcityatty.org

25 *Attorneys for Plaintiffs City and County of San*
26 *Francisco, San Francisco County Transportation*
27 *Authority, and Treasure Island Mobility*
Management Agency

OFFICE OF THE COUNTY COUNSEL,
COUNTY OF SANTA CLARA

/s/ Tony LoPresti

Tony LoPresti (CA Bar No. 289269)

County Counsel

Kavita Narayan (CA Bar No. 264191)

Chief Assistant County Counsel

Meredith A. Johnson (CA Bar No. 291018)

Lead Deputy County Counsel

Stefanie L. Wilson (CA Bar No. 314899)

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 6
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

1 Cara H. Sandberg (CA Bar No. 291058)
2 *Deputy County Counsels*
3 70 West Hedding Street
4 East Wing, 9th Floor
5 San José, CA 95110
6 (408) 299-9021
7 tony.lopresti@cco.sccgov.org
8 kavita.narayan@cco.sccgov.org
9 meredith.johnson@cco.sccgov.org
10 stefanie.wilson@cco.sccgov.org
11 cara.sandberg@cco.sccgov.org

12 *Attorneys for Plaintiff County of Santa Clara*

13 ADAM CEDERBAUM
14 Corporation Counsel, City of Boston

15 /s/ Samantha H. Fuchs
16 Samantha H. Fuchs (MA BBO No. 708216)
17 *Senior Assistant Corporation Counsel*
18 Samuel B. Dinning (MA BBO No. 704304)
19 *Senior Assistant Corporation Counsel*
20 One City Hall Square, Room 615
21 Boston, MA 02201
22 (617) 635-4034
23 samantha.fuchs@boston.gov
24 samuel.dinning@boston.gov

25 *Attorneys for Plaintiff City of Boston*

26 CITY OF COLUMBUS, DEPARTMENT OF LAW
27 ZACH KLEIN, CITY ATTORNEY

28 /s/ Richard N. Coglianese
29 Richard N. Coglianese (OH Bar No. 0066830)
30 Assistant City Attorney
31 77 N. Front Street, 4th Floor
32 Columbus, Ohio 43215
33 Tel: (614) 645-0818
34 Fax: (614) 645-6949
35 rncoglianese@columbus.gov
36 *Attorney for Plaintiff City of Columbus*

37 PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 7
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

PUBLIC RIGHTS PROJECT

/s/ Sharanya Mohan

Sharanya (Sai) Mohan (CA Bar No. 350675)

Naomi Tsu (OR Bar No. 242511)

Toby Merrill (MA Bar No. 601071)

Public Rights Project

490 43rd Street, Unit #115

Oakland, CA 94609

(510) 738-6788

sai@publicrightsproject.org

naomi@publicrightsproject.org

toby@publicrightsproject.org

*Counsel for Plaintiffs City of Columbus, City
& County of Denver, Metro Government of
Nashville & Davidson County, Pima County,
County of Sonoma, City of Bend, City of
Cambridge, City of Chicago, City of Culver
City, City of Minneapolis, City of Pasadena,
City of Pittsburgh, City of Portland, City of
San José, City of Santa Monica, City of
Tucson, City of Wilsonville, Santa Monica
Housing Authority*

MURIEL GOODE-TRUFANT

Corporation Counsel of the City of New York

/s/ Doris Bernhardt

Doris Bernhardt (NY Bar No. 4449385)

Joshua P. Rubin (NY Bar No. 2734051)

Aatif Iqbal (NY Bar No. 5068515)

Assistant Corporation Counsels

100 Church Street

New York, NY 10007

(212) 356-1000

dbernar@law.nyc.gov

jrubin@law.nyc.gov

aiqbal@law.nyc.gov

Attorneys for Plaintiff City of New York

1 ASHLEY M. KELLIHER
2 Assistant City Attorney

3 /s/ Ashley M. Kelliher
4 Ashley M. Kelliher (CO Bar No. 40220)
5 Assistant City Attorney
6 Denver City Attorney's Office
7 201 West Colfax Avenue
8 Denver, Colorado 80202
9 Tel: (720) 913-3137
10 Fax: (720) 913-3190
11 ashley.kelliher@denvergov.org

12 DAVID P. STEINBERGER
13 Assistant City Attorney

14 /s/ David P. Steinberger
15 David P. Steinberger (CO Bar No. 48530)
16 Assistant City Attorney
17 Denver City Attorney's Office
18 Denver International Airport
19 8500 Pena Boulevard
20 Airport Office Building, 9th Floor
21 Denver, Colorado 80249-6340
22 Tel: (303) 342-2562
23 david.steinberger@flydenver.com

24 *Attorneys for Plaintiff City and County of Denver*

25 LAURA CONOVER
26 Pima County Attorney

27 /s/ Bobby Yu
Samuel E. Brown (AZ Bar No. 027474)
Bobby Yu (AZ Bar No. 031237)
Kyle Johnson (AZ Bar No. 032908)
Pima County Attorney's Office, Civil Division
32 N. Stone, Suite 2100
Tucson, Arizona 85701
(520) 724-5700
sam.brown@pcao.pima.gov
bobby.yu@pcao.pima.gov
kyle.johnson@pcao.pima.gov

Attorneys for Plaintiff Pima County

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 9
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

ROBERT H. PITTMAN, County Counsel

/s/ Joshua A. Myers

Joshua A. Myers (CA Bar No. 250988)

Chief Deputy County Counsel

Sonoma County Counsel's Office

575 Administration Drive, Rm. 105A

Santa Rosa, CA 95403

Tel: (707) 565-2421

Fax: (707) 565-2624

Joshua.Myers@sonoma-county.org

*Attorneys for Plaintiffs County of Sonoma,
Sonoma County Transportation Authority, and
Sonoma County Community Development
Commission*

OFFICE OF THE CITY ATTORNEY FOR THE
CITY OF BEND

/s/ Ian M. Leitheiser

Ian M. Leitheiser (OSB #993106)

City Attorney

Elizabeth Oshel (OSB #104705)

Senior Assistant City Attorney

Michael J. Gaffney (OSB #251680)

Senior Assistant City Attorney

City of Bend

PO Box 431

Bend, OR 97709

(541) 693-2128

ileitheiser@bendoregon.gov

eoshel@bendoregon.gov

mgaffney@bendoregon.gov

Attorneys for Plaintiff City of Bend

CITY OF CAMBRIDGE, LAW DEPARTMENT
MEGAN B. BAYER, CITY SOLICITOR

/s/ Megan B. Bayer

Megan B. Bayer (MA BBO No. 669494)

City Solicitor

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 10
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

1 Elliott J. Veloso (MA BBO No. 677292)
2 *Deputy City Solicitor*
3 Diane Pires (MA BBO No. 681713)
4 *Assistant City Solicitor*
5 Cambridge City Hall, 3rd Floor
6 795 Massachusetts Avenue
7 Cambridge, MA 02139
8 (617) 349-4121
9 mbayer@cambridgema.gov
10 eveloso@cambridgema.gov
11 dpires@cambridgema.gov

12 *Attorneys for Plaintiff City of Cambridge*

13 MARY B. RICHARDSON-LOWRY
14 Corporation Counsel of the City of Chicago

15 /s/ Rebecca Hirsch

16 Rebecca Hirsch (IL Bar No. 6279592)
17 Chelsey Metcalf (IL Bar No. 6337233)
18 City of Chicago Department of Law
19 121 North LaSalle Street, Room 600
20 Chicago, Illinois 60602
21 (313) 744-9484
22 rebecca.hirsch2@cityofchicago.org
23 chelsey.metcalf@cityofchicago.org

24 *Attorneys for Plaintiff City of Chicago*

25 KRISTYN ANDERSON
26 City Attorney

27 /s/ Kristyn Anderson

Kristyn Anderson (MN Lic. 0267752)
City Attorney
Sara J. Lathrop (MN Lic. 0310232)
Munazza Humayun (MN Lic. 0390788)
Assistant City Attorneys
350 South Fifth Street
Minneapolis, MN 55415
(612) 673-3000
kristyn.anderson@minneapolismn.gov
sara.lathrop@minneapolismn.gov

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 11
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

munazza.humayun@minneapolismn.gov

Attorneys for Plaintiff City of Minneapolis

KRYSIA KUBIAK, Esq.
City Solicitor

/s/ Julie E. Koren

Julie E. Koren (PA Bar No. 309642)

Associate City Solicitor

City of Pittsburgh, Dept. of Law

313 City-County Building

414 Grant Street

Pittsburgh, PA 15219

(412) 255-2025

Julie.Koren@pittsburghpa.gov

Krysia.Kubiak@Pittsburghpa.gov

Counsel for Plaintiff City of Pittsburgh

ROBERT TAYLOR
Portland City Attorney

/s/ Caroline Turco

Caroline Turco (OR Bar No. 083813)

Senior Deputy City Attorney

1221 SW Fourth Avenue, Room 430

Portland, OR 97204

Tel: (503) 823-4047

Fax: (503) 823-3089

Caroline.Turco@portlandoregon.gov

Attorney for Plaintiff City of Portland

NORA FRIMANN
City Attorney

/s/ Nora Frimann

Nora Frimann (CA Bar No. 93249)

City Attorney

Elisa Tolentino (CA Bar No. 245962)

Chief Deputy City Attorney

200 E Santa Clara St

PLAINTIFFS' UNOPPOSED MOTION TO
AMEND COMPLAINT - 12
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

1 San José, CA 95113-1905
2 Tel: (408) 535-1900
3 Fax: (408) 998-3131
4 cao.main@sanjoseca.gov

Attorneys for Plaintiff City of San José

5
6 CITY OF WILSONVILLE

7 /s/ Amanda R. Guile-Hinman
8 Amanda R. Guile-Hinman, WSBA #46282
9 29799 SW Town Center Loop E
10 Wilsonville, OR 97070
11 (503) 570-1509
12 guile@wilsonvilleoregon.gov

Attorneys for the City of Wilsonville

13 CENTRAL PUGET SOUND REGIONAL
14 TRANSIT AUTHORITY

15 /s/ Andrés Muñoz
16 Andrés Muñoz, WSBA #50224
17 Desmond Brown, WSBA #16232

18 Central Puget Sound Regional Transit Authority
19 401 S. Jackson St.
20 Seattle, WA 98104
21 (206) 665-8989
22 andres.munoz@soundtransit.org
23 desmond.brown@soundtransit.org

*Attorneys for the Central Puget Sound Regional
Transit Authority*

24 LAW, LYMAN, DANIEL, KAMERRER
25 & BOGDANOVICH, P.S.

26 /s/ Jeffrey S. Myers
27 Jeffrey S. Myers, WSBA #16390
Erin L. Hillier, WSBA #42883
Jakub Kocztorz, WSBA #61393

1 P.O. Box 11880
2 Olympia, WA 98508
3 Tel: (360) 754-3480
4 Fax: (360) 357-3511
5 jmyers@lldkb.com
6 ehillier@lldkb.com
7 jkocztorz@lldkb.com

Attorneys for Plaintiff Intercity Transit

8 ANDERSON & KREIGER LLP

/s/ Melissa C. Allison

9 Melissa C. Allison (MA Bar No. 657470)
10 David S. Mackey (MA Bar No. 542277)
11 Christina S. Marshall (MA Bar No. 688348)
12 Anderson & Kreiger LLP
13 50 Milk Street, Floor 21
14 Boston, MA 02109
15 (617) 621-6500
16 mallison@andersonkreiger.com
17 dmackey@andersonkreiger.com
18 cmarshall@andersonkreiger.com

*Attorneys for Plaintiffs Port of Seattle and
Milwaukee County*

17 KING COUNTY REGIONAL
18 HOMELESSNESS AUTHORITY

/s/ Edmund Witter

19 Edmund Witter, WSBA #52339
20 King County Regional Homelessness Authority
21 400 Yesler Way Suite 600
22 Seattle, WA 98104
23 (206) 639-7013
24 Edmund.witter@kcrha.org

*Attorneys for Plaintiff King County Regional
Homelessness Authority*

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2025, I served a true and correct copy of the Plaintiffs' Unopposed Motion to Amend Complaint on the existing parties by the method(s) indicated below:

Brian C. Kipnis Annalisa L. Cravens Sarah L. Bishop Rebecca S. Cohen <i>Assistant United States Attorneys</i> Office of the United States Attorney 700 Stewart Street, Suite 5220 Seattle, WA 98101-1271 brian.kipnis@usdoj.gov annalisa.cravens@usdoj.gov sarah.bishop@usdoj.gov rebecca.cohen@usdoj.gov <i>Attorneys for all Defendants</i>	<input checked="" type="checkbox"/> CM/ECF E-service <input type="checkbox"/> Email <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail / Return Receipt Requested <input type="checkbox"/> Hand delivery / Personal service
---	---

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 10th day of July, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio
 Litigation Assistant
 Pacifica Law Group LLP

PLAINTIFFS' UNOPPOSED MOTION TO
 AMEND COMPLAINT - 15
 No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
 401 UNION STREET
 SUITE 1600
 SEATTLE, WASHINGTON 98101-2668
 TELEPHONE: (206) 245-1700
 FACSIMILE: (206) 245-1750